

CHRISTOPHER CHIOU  
WILSON SONSINI GOODRICH & ROSATI  
Professional Corporation  
633 West Fifth Street  
Los Angeles, CA 90071-2048  
Telephone: (323) 210-2900  
Facsimile: (866) 974-7329  
Email: cchiou@wsgr.com

*Attorneys for Defendants YouTube, LLC and  
Google LLC*

*Additional counsel listed on  
signature pages*

**UNITED STATES DISTRICT COURT**  
**FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
**OAKLAND DIVISION**

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION

) MDL No. 3047  
) CASE NO.: 4:22-md-03047-YGR  
)

THIS DOCUMENT RELATES TO:

*YouTube, LLC and Google LLC*

4:23-cv-05448-YGR

) **JOINT STIPULATION AND**  
) ~~**PROPOSED**~~ **ORDER ON (1)**  
) **PRODUCTION OF CUSTODIAL**  
) **FILES FROM JENNIFER FLANNERY**  
) **O’CONNOR AND K.K., (2)**  
) **REQUESTS FOR PRODUCTION SET**  
) **12, AND (3) NON-CUSTODIAL**  
) **SOURCES**

)  
) Honorable Yvonne Gonzalez Rogers  
) Honorable Peter H. Kang  
)

1       **I. Stipulation Regarding Production of Custodial Files of Jennifer Flannery**  
 2       **O'Connor and K.K.**

3       Pursuant to the Court's April 4, 2025 Order Resolving Dispute Regarding YouTube's  
 4       Amended Rule 26(a) Initial Disclosures (ECF No. 1840), Defendants Google and YouTube and  
 5       Plaintiffs have resolved their dispute regarding the production of documents from the custodial  
 6       files of Jennifer Flannery O'Connor and K.K. (ECF No. 1803).

7       After meeting and conferring, the Parties have agreed upon a set of search terms to be used  
 8       to cull documents for review for each custodian. The Parties further stipulate to a May 30, 2025,  
 9       deadline for YouTube to complete a rolling production of documents from Jennifer Flannery  
 10       O'Connor's and K.K.'s custodial files.

11       **II. Stipulation Regarding Production of Documents Responsive to RFP Set 12**

12       Pursuant to Civil Local Rules 6-1(b), 6-2, 37-3, the parties, through their undersigned  
 13       counsel, hereby stipulate and respectfully request that the Court extend the deadline for Plaintiffs  
 14       and Defendants Google, LLC and YouTube, LLC ("Defendants") to complete certain fact discovery.

15       WHEREAS, pursuant to the Court's discovery schedule, fact discovery concluded on April  
 16       4, 2025;

17       WHEREAS, up until April 10, 2025, the parties were meeting and conferring on a dispute  
 18       as to RFP No. 163, which requested:

19       All Documents and Communications regarding Your development, design,  
 20       policies, procedures, implementation, or any proposed versions thereof, of the  
 21       "machine learning [You will use] in 2025 to help [You] estimate a user's age –  
 22       distinguishing between younger viewers and adults – to help provide the best and  
 23       most age appropriate experience and protections," referenced in a February 11,  
 24       2025 announcement from YouTube CEO Neal Mohan. *See*  
 25       <https://blog.youtube/inside-youtube/our-big-bets-for-2025/>.

26       WHEREAS, on the evening of April 10, 2025, the Parties were able to reach agreement as  
 27       to the scope and timing of production of responsive documents to RFP No. 163, thereby negating  
 28

1 the need to file a Joint Letter Brief, but also necessarily contemplating fact discovery production  
2 beyond the Court's fact discovery deadline;

3 NOW and THEREFORE, the Parties stipulate and agree, subject to the approval of the  
4 Court, that the time to complete production of documents in response to RFP No. 163 will be as  
5 follows:

- 6 1. Production of responsive documents to RFP No. 163 from the custodial file of Neal  
7 Mohan will be by April 21, 2024; and,
- 8 2. Production of responsive documents to RFP No. 163 from the custodial file of J.B. will  
9 be by May 30, 2025.

10 The Parties agree that the requested extensions herein will not affect any other deadline  
11 affixed by the Court.

12 **III. Stipulation Regarding the Production of Documents from Non-Custodial Sources**

13 Pursuant to Civil Local Rules 6-1(b) and 6-2, the parties, through their undersigned  
14 counsel, hereby stipulate and respectfully request that the Court extend the deadline for Plaintiffs  
15 and Defendants Google, LLC and YouTube, LLC ("Defendants") to complete certain fact  
16 discovery.

17 WHEREAS, despite the parties' best efforts and diligence to resolve all fact discovery  
18 issues before the April 4, 2025 deadline, certain discovery issues were not complete and/or ripe  
19 for briefing by April 4, 2025. Accordingly, Plaintiffs and Defendants have mutually agreed to  
20 schedule the following:

21 With respect to YouTube's production from non-custodial sources, YouTube's production  
22 from certain non-custodial sources has not yet been completed and, for one or more non-custodial  
23 sources, is anticipated to continue following the close of fact discovery. Accordingly, the parties  
24 propose the following:  
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26  
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- 1 A. YouTube will complete its production from the F Source under the terms of the Parties’  
2 agreement by May 1, 2025.
- 3 B. YouTube will complete its production from the A Source under the terms of the Parties’  
4 agreement by May 1, 2025.
  - 5 1. If Plaintiffs identify the agreed-upon R Source links within 7 days of completion  
6 of production of the A Source, YouTube will complete its production of  
7 identified R Source hyperlinks from the A Source under the terms of the Parties’  
8 agreement by within 14 days of Plaintiffs’ identification of the R Source links.  
9
- 10 C. YouTube will complete its production from the L Source under the terms of the Parties’  
11 agreement by May 1, 2025.
- 12 D. YouTube has completed its production of csv files from the B Source under the terms of  
13 the Parties’ agreement. If Plaintiffs provide the agreed-upon list of individual tickets by  
14 April 16, per the Parties’ agreement, YouTube will complete its production of identified  
15 individual tickets by May 12, 2025.
- 16 E. YouTube will complete its production from the M Source under the terms of the Parties’  
17 agreement by May 15, 2025.
- 18 F. To the extent there is a dispute with respect to YouTube’s completed production from a  
19 particular non-custodial source, the parties will need time to review and determine any  
20 deficiencies in the production, and the parties therefore agree to extend the deadline to  
21 file a Joint Letter Brief with respect to that source as follows:
  - 22 1. May 7, or 4 business days after final productions from any source completed  
23 after May 1: Plaintiffs identify deficiencies with particularity in writing,  
24 including the relief that Plaintiffs would seek in any subsequent briefing;
  - 25 2. 3 business days later: YouTube responds in writing to Plaintiffs’ deficiencies;
  - 26 3. 3 business days later: H2 conference regarding the specified deficiencies;  
27  
28

4. 5 business days later: Any joint letter brief filed in connection with the specified deficiencies and the relief sought.

G. The Parties have agreed to finalize a stipulation regarding the authenticity and admissibility of YouTube's productions from the F Source, L Source, A Source, B Source, and M Source upon their completed production. The Parties have further agreed that this stipulation shall include:

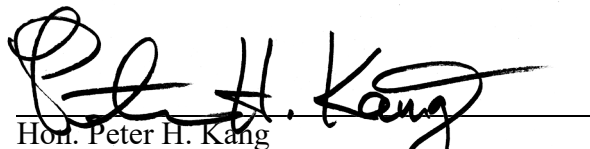
1. Confirmation that each production is a true and correct copy of records of regularly conducted activity under Fed. R. Evid. 803(6);
2. Exhibits thereto (which are to be filed under seal) setting forth as to each source certain agreed-upon details regarding search methodology and the resulting productions.

H. To the extent there are disputes with regard to the stipulation described in section G, the parties agree that such disputes will be briefed as a part of any Joint Letter Brief contemplated under section F.

The parties agree that the requested extensions herein will not affect any other deadline affixed by the Court.

**IT IS SO ORDERED**

Dated: April 14, 2025

  
Hon. Peter H. Kang  
United States Magistrate Judge

Respectfully submitted,

Dated: April 11, 2025

**WILSON SONSINI GOODRICH & ROSATI**  
**Professional Corporation**

By: /s/ Christopher Chiou  
Christopher Chiou (State Bar No. 233587)  
Wilson Sonsini Goodrich & Rosati  
cchiou@wsgr.com

Matthew K. Donohue (State Bar No. 302144)  
mdonohue@wsgr.com  
633 West Fifth Street  
Los Angeles, CA 90071-2048  
Telephone: (323) 210-2900  
Facsimile: (866) 974-7329

Brian M. Willen, *pro hac vice*  
Wilson Sonsini Goodrich & Rosati  
bwillen@wsgr.com  
1301 Avenue of the Americas, 40th Floor  
New York, New York 10019  
Telephone: (212) 999-5800  
Facsimile: (212) 999-5899

Lauren Gallo White (State Bar No. 309075)  
Wilson Sonsini Goodrich & Rosati  
lwhite@wsgr.com  
Andrew Kramer (State Bar No. 321574)  
akramer@wsgr.com  
Carmen Sobczak (State Bar No. 342569)  
csobczak@wsgr.com  
One Market Plaza, Spear Tower, Suite 3300  
San Francisco, CA 94105  
Telephone: (415) 947-2000  
Facsimile: (415) 947-2099

**MORGAN, LEWIS & BOCKIUS LLP**  
Yardena R. Zwang-Weissman (SBN 247111)  
yardena.zwang-weissman@morganlewis.com  
300 South Grand Avenue, 22nd Floor  
Los Angeles, CA 90071-3132  
Telephone: (213) 612-7238

Brian Ercole (*pro hac vice*)  
brian.ercole@morganlewis.com  
600 Brickell Avenue, Suite 1600  
Miami, FL 33131-3075  
Telephone: (305) 415-3416

Stephanie Schuster (*pro hac vice*)  
Stephanie.schuster@morganlewis.com  
1111 Pennsylvania Avenue NW  
Washington, DC 20004-2541  
Telephone: (202) 373-6595

**WILLIAMS & CONNOLLY LLP**

Joseph G. Petrosinelli  
jpetrosinelli@wc.com  
Ashley W. Hardin  
ahardin@wc.com  
680 Maine Avenue, SW  
Washington, DC 20024  
Telephone.: (202) 434-5000  
Facsimile: (202) 434-5029

*Attorneys for Defendants YouTube, LLC,  
and Google LLC*

Dated: April 11, 2025

By: /s/ Lexi J. Hazam  
LEXI J. HAZAM  
**LIEFF CABRASER HEIMANN &  
BERNSTEIN, LLP**  
275 Battery Street, 29<sup>th</sup> Floor  
San Francisco, CA 94111-3339  
Telephone: 415-956-1000  
lhazam@lchb.com

PREVIN WARREN  
**MOTLEY RICE LLC**  
401 9th Street NW Suite 630  
Washington DC 20004  
Telephone: 202-386-9610  
pwarren@motleyrice.com

Co-Lead Counsel

CHRISTOPHER A. SEEGER  
**SEEGER WEISS, LLP**  
55 Challenger Road, 6<sup>th</sup> floor  
Ridgefield Park, NJ 07660  
Telephone: 973-639-9100  
Facsimile: 973-679-8656  
cseeger@seegerweiss.com

Counsel to Co-Lead Counsel and Settlement  
Counsel

JENNIE LEE ANDERSON  
**ANDRUS ANDERSON, LLP**  
155 Montgomery Street, Suite 900  
San Francisco, CA 94104  
Telephone: 415-986-1400  
jennie@andrusanderson.com

Liaison Counsel

1 JOSEPH G. VANZANDT  
2 **BEASLEY ALLEN CROW METHVIN**  
3 **PORTIS & MILES, P.C.**  
4 234 Commerce Street  
Montgomery, AL 36103  
Telephone: 334-269-2343  
joseph.vanzandt@beasleyallen.com

5 EMILY C. JEFFCOTT  
6 **MORGAN & MORGAN**  
7 220 W. Garden Street, 9<sup>th</sup> Floor  
Pensacola, FL 32502  
Telephone: 850-316-9100  
ejeffcott@forthepeople.com

8 Federal/State Liaison Counsel

9 MATTHEW BERGMAN  
10 **SOCIAL MEDIA VICTIMS LAW CENTER**  
11 821 Second Avenue, Suite 2100  
Seattle, WA 98104  
Telephone: 206-741-4862  
matt@socialmediavictims.org

12 JAMES J. BILSBORROW  
13 **WEITZ & LUXENBERG, PC**  
14 700 Broadway  
New York, NY 10003  
Telephone: 212-558-5500  
Facsimile: 212-344-5461  
jbilsborrow@weitzlux.com

15 JAYNE CONROY  
16 **SIMMONS HANLY CONROY LLP**  
17 112 Madison Ave, 7<sup>th</sup> Floor  
New York, NY 10016  
Telephone: 917-882-5522  
jconroy@simmonsfirm.com

18 ANDRE MURA  
19 **GIBBS LAW GROUP, LLP**  
20 1111 Broadway, Suite 2100  
Oakland, CA 94607  
Telephone: 510-350-9717  
amm@classlawgroup.com

21 ALEXANDRA WALSH  
22 **WALSH LAW**  
23 1050 Connecticut Ave, NW, Suite 500  
Washington D.C. 20036  
Telephone: 202-780-3014  
awalsh@alexwalshlaw.com



1 MICHAEL M. WEINKOWITZ  
2 **LEVIN SEDRAN & BERMAN, LLP**  
3 510 Walnut Street Suite 500  
4 Philadelphia, PA 19106  
5 Telephone: 215-592-1500  
6 mweinkowitz@lfsbalw.com

7 Plaintiffs' Steering Committee Leadership

8 RON AUSTIN  
9 **RON AUSTIN LAW**  
10 400 MANHATTAN BLVD  
11 HARVEY, LA 70058  
12 Telephone: 504-227-8100  
13 raustin@ronaustinlaw.com

14 PAIGE BOLDT  
15 **WATTS GUERRA LLP**  
16 4 Dominion Drive, Bldg. 3, Suite 100  
17 San Antonio, TX 78257  
18 Telephone: 210-448-0500  
19 PBoldt@WattsGuerra.com

20 THOMAS P. CARTMELL  
21 **WAGSTAFF & CARTMELL LLP**  
22 4740 Grand Avenue, Suite 300  
23 Kansas City, MO 64112  
24 Telephone: 816-701 1100  
25 tcartmell@wcllp.com

26 SARAH EMERY  
27 **HENDY JOHNSON VAUGHN EMERY, PSC**  
28 2380 Grandview Drive  
Ft. Mitchell, KY 41017  
Telephone: 888-606-5297  
semery@justicestartshere.com

CARRIE GOLDBERG  
**C.A. GOLDBERG, PLLC**  
16 Court St.  
Brooklyn, NY 11241  
Telephone: (646) 666-8908  
carrie@cagoldberglaw.com

RONALD E. JOHNSON, JR.  
**HENDY JOHNSON VAUGHN EMERY, PSC**  
600 West Main Street, Suite 100  
Louisville, KY 40202  
Telephone: 859-578-4444  
rjohnson@justicestartshere.com

SIN-TING MARY LIU

**AYLSTOCK WITKIN KREIS &  
OVERHOLTZ, PLLC**

17 East Main Street, Suite 200  
Pensacola, FL 32502  
Telephone: 510-698-9566  
mliu@awkolaw.com

**JAMES MARSH  
MARSH LAW FIRM PLLC**

31 Hudson Yards, 11th floor  
New York, NY 10001-2170  
Telephone: 212-372-3030  
jamesmarsh@marshlaw.com

**HILLARY NAPPI  
HACH & ROSE LLP**

112 Madison Avenue, 10th Floor  
New York, New York 10016  
Telephone: 212.213.8311  
hnappi@hrsclaw.com

**EMMIE PAULOS  
LEVIN PAPANTONIO RAFFERTY**

316 South Baylen Street, Suite 600  
Pensacola, FL 32502  
Telephone: 850-435-7107  
epaulos@levinlaw.com

**RUTH THI RIZKALLA  
THE CARLSON LAW FIRM, P.C.**

1500 Rosecrans Ave., Ste. 500  
Manhattan Beach, CA 90266  
Telephone: 415-308-1915  
rrizkalla@carlsonattorneys.com

**ROLAND TELLIS  
DAVID FERNANDES  
BARON & BUDD, P.C.**

15910 Ventura Boulevard, Suite 1600  
Encino, CA 91436  
Telephone: (818) 839-2333  
Facsimile: (818) 986-9698  
rtellis@baronbudd.com  
dfernandes@baronbudd.com

**MELISSA YEATES  
JOSEPH E. MELTZER  
KESSLER TOPAZ MELTZER & CHECK, LLP**

280 King of Prussia Road  
Radnor, PA 19087  
Telephone: 610-667-7706  
myeates@ktmc.com  
jmeltzer@ktmc.com

DIANDRA “FU” DEBROSSE ZIMMERMANN  
**DICELLO LEVITT**

505 20<sup>th</sup> St North Suite 1500  
Birmingham, Alabama 35203  
Telephone: 205.855.5700  
fu@dicellolevitt.com

Plaintiffs’ Steering Committee Membership

*Attorneys for Plaintiffs*

**ATTESTATION**

I hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: April 11, 2025

/s/ Audrey Siegel  
Audrey Siegel